CHARLES N. GUTHRIE, ESQ. (SBN 76644)
121 Broadway, Suite 531
San Diego, California 92101
Tel. (619) 230-8598/Fax (619) 230-0017

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
HON. WILLIAM Q. HAYES

UNITED STATES OF AMERICA Plaintiff, vs. Marco Antonio Sanchez-Hernandez, Defendant.	08 CR 00751 - WQH **EX-PARTE MOTION FOR ORDER SHORTENING TIME ; ORDER** Date: June 30, 2008 Time: 10:00 a.m. Dept: Hon. William Q. Hayes

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND HER DESIGNATED ASSISTANT: AUSA GEORGE MANAHAN.

Defendant, Marco Atonio Sanchez-Hernandez is set for sentencing on June 30, 2008, at 9:00 a.m., before the Honorable Judge William Q. Hayes, and this ex-parte motion to shorten time is made requesting an order to allow late filing of his Sentence Memorandum and Sentence Summary Chart.

DECLARATION IN SUPPORT OF ORDER

My name is Charles N. Guthrie and I am the court appointed CJA attorney for

Marco Antonio Sanchez-Hernandez. I have been preparing for two very serious felony trials and have been unable to timely for defendant's sentence memorandum. The thrust of the sentence memorandum is to request the court follow a recommended sentence and there is no prejudice to the prosecution.

In order to represent defendant effectively I'm moving the court allow his Sentence Memorandum/ and Sentence Summary Chart filed no later than June 27, 2008.

I declare/ certify the above true under penalty of perjury executed this June 27, 2008, in the City of San Diego, State of California.

S/ Charles N. Guthrie
Charles N. Guthrie

ARGUMENT

The Sentence Memorandum and Sentence Summary Chart will not prejudice the prosecution in that the thrust of said documents is what was agreed to in the plea agreement.

Respectfully submitted,

June 27, 2008

S/Charles N. Guthrie
Charles N. Guthrie, Attorney at Law